

**Before the  
Federal Communications Commission  
Washington, DC**

In the Matter of	)	
	)	
Request for Review of the Decision of the	)	
Universal Service Administrator or Waiver by	)	
	)	
Edmond Independent School District #12	)	File No. SLD-553420
Edmond, Oklahoma	)	
	)	
Schools and Libraries Universal Service	)	CC Docket No. 02-6
Support Mechanism	)	

**REQUEST FOR REVIEW OR WAIVER**

Edmond Independent School District (“School District”), by its representative, hereby requests that the Commission review and reverse the Decision on Appeal of the Universal Service Administrator (“USAC”) in the above referenced matter, dated April 3, 2008, finding insufficient evidence to change the status of an FCC Form 471 application from “incomplete” to “complete” (Exhibit 1). Alternatively, the School District requests that the Commission waive the 2007 Funding Year FCC Form 471 filing window deadline for that application. In either case, the School District requests that the Commission remand this matter to USAC with instructions to process the School District’s Form 471 application No. 553420.

**I. FACTS**

The facts are set forth and discussed in detail in the School District’s Letter of Appeal to the Administrator (Exhibit 2). Briefly, the relevant facts are these. The School District timely filed by February 7, 2007 *three* 2007 Funding Year Form 471 applications, including certifications and Item 21 (Description of Service) Attachments. When the School District discovered on February 14, 2007 that *one* of its three

applications, No. 553420, was apparently not being processed, it contacted USAC immediately. USAC explained to the School District that this Form 471, which included requests for \$77,445 in support, was not being processed because it was appearing in USAC's electronic filing system as "incomplete."

Becki Teague ("Teague"), the School District's Instructional Technology Coordinator, is not a novice at filing E-rate applications. Teague did everything she thought she was supposed to do and reasonably could be expected to do to file this application online and on time. On January 29, 2007, she went to USAC's website where she completed and submitted two Form 471 applications, including the one in issue, No. 553420. She printed out the respective certification pages, had them signed, completed the requisite Item 21 attachments, and sent the entire package of documents to USAC via certified mail. The School District received back a U.S.P.S proof of delivery notice showing that USAC received the package on February 1, 2007. *See* Exhibit 2 (Letter of Appeal) at p.2/Exhibit 1. *See also* Exhibit 3 (Affidavit of Becki Teague).

It is important to note that around the time that Teague was attempting, in good faith, to file No. 553420, USAC was experiencing serious problems with its online filing system. The problems proved to be so serious in fact that USAC was forced to extend the filing deadline because of them. *See* Letter of Appeal at p.3. Whether USAC's electronic issues affected the School District's ability to "complete" its online filing, we can only speculate. The timing of those server problems, however, does raise substantial concerns.

## **II. DISCUSSION**

On appeal, USAC concluded, without explanation, that the School District had failed to prove that it had filed Form 471 No. 553420 on time. *See* Exhibit 1. Even now, after further investigation, the School District is still not quite sure whether the "incomplete" status attached to the application resulted from an alleged failure to submit the application online or to deliver the related certification form by mail or both. In any event, the School District contends that the evidence submitted to USAC was sufficient to show that it did everything it reasonably could have done to complete and file both its

application and certification on time. If there was an electronic filing problem, there is good reason to believe that it occurred at USAC's end of the pipe.

On the other hand, the School District also recognizes that it is not infallible, and that a complex, complicated process like the E-rate process can certainly lead to unintentional, good faith mistakes, despite everyone's best efforts and intentions. Perhaps the School District actually missed the February 7<sup>th</sup> filing deadline because Teague believed mistakenly that, on January 29<sup>th</sup>, she had submitted both of the School District's Form 471s online, and not just one. Perhaps Form 471 No. 554320 never got submitted because Teague thought she had clicked on the submit button, but was wrong about that, or perhaps the button failed to work because of an inopportune Internet glitch or a network issue. Around that time, it is also possible that a USAC server problem could have interfered with her ability to submit this application online. And finally, even *if* there was also a problem with the Form 471 certification, there is no question that it would have been due to a clerical error (the School District has been unable to confirm whether it sent two different certifications to USAC or duplicates of the same form), as there is no dispute that Teague sent USAC two different Form 471s together with *two* certification forms. Therefore, even assuming that it was the School District's fault, not USAC's, that application No. 554320 appears in USAC's system as "incomplete," a waiver of the filing deadline is still very much appropriate and warranted. No matter where the fault belongs and what actually happened, one thing remains constant, and that is that both the public interest and precedent warrant a waiver of the Form 471 filing deadline for *this* application in *this* particular set of circumstances.

In the *Academy for Academic Excellence Order*<sup>1</sup>, the Commission granted 44 requests seeking waiver of the Commission's rule that denied funding for applications filed outside of the FCC Form 471 filing window.<sup>2</sup> Citing the *Bishop Perry Order*<sup>3</sup>, the

---

<sup>1</sup> See *Request for Review of the Decision of the Universal Service Administrator Academy for Academic Excellence, Apple Valley, CA, et al., Schools and Libraries Universal Service Support Mechanism, SLD File Nos. 539076, 539722, et al* CC Docket No. 02-6 (2007)

<sup>2</sup> A rule may be waived where the particular facts make strict compliance inconsistent with the public interest. *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast*

Commission agreed with the petitioners' assertions that waiver was appropriate either because "(1) someone on the applicants' staff failed to file on time due to misunderstanding or personal emergencies, or (2) the delay in the filing or the receipt by USAC of the FCC Form 471 was due to circumstances out of the applicants' control."<sup>4</sup> The Commission went on to detail a multitude of factors that caused the petitioners to miss the filing deadline in the 44 cases before it:<sup>5</sup>

[S]everal Petitioners state that they were unable to comply with the filing deadline due to staff illness or relatives of staff members who were ill. Other Petitioners indicate that relevant members inadvertently failed to file the application forms in a timely manner. Still other Petitioners claim that the rules and instructions for filing the FCC Form 471 are vague and unclear and that the resulting misunderstandings led to forms being filed after the filing window. The remainder of Petitioners failed to file an FCC Form 471 in a timely manner due to circumstances beyond their control, such as school reorganizations or inclement weather. In particular, Petitioners state that technical problems, either with their own equipment or while interfacing with USAC's electronic filing mechanism, prevented their FCC Forms 471 from being timely filed.

The Commission explained that each one of the above reasons for missing the deadline constituted a legitimate basis for waiving section 54.507 of its rules as it pertains to the Form 471 deadline:

As the Commission found in the *Bishop Perry Order*, we find that the complete rejection of these applications is not warranted, given that the violation at issue is procedural, not substantive. Like the applicants in the *Bishop Perry Order*, the

---

*Cellular*). In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis. *WAIT Radio v. FCC*, 418 F.2d 1153, 1157, (D.C. Cir. 1969), *affirmed by WAIT Radio v. FCC*, 459 F.2d 1203 (D.C. Cir. 1972). In sum, waiver is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public interest than strict adherence to the general rule. *Northeast Cellular*, 897 F.2d at 1166.

<sup>3</sup> *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, New Orleans, LA, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-487170, *et al.*, CC Docket No. 02-6, Order, 21 FCC Rcd 5316 (2006) (*Bishop Perry Order*) (waiving the Commission's rules to, *inter alia*, allow applicants' to timely file their FCC Forms 471).

<sup>4</sup> *Academy for Academic Excellence Order* at paras 4.

<sup>5</sup> *Id.* at paras. 4-5.

applicants at issue here have demonstrated that rigid adherence to filing procedures does not further the purposes of section 254(h) of the Telecommunications Act of 1996 or serve the public interest.

Compared to the reasons offered in *Academy for Academic Excellence* for failing to meet the Form 471 filing deadline, the School District's reasons for missing it (assuming it did miss it), are certainly as compelling and, in some cases, considerably more so. The School District, for example, did not miss the deadline because it could not understand the rules. Indeed, it was very familiar with the rules and did its best to comply with all of them. That is why Teague immediately sent off to USAC the Form 471 certification pages and Item 21 attachments after believing, in good faith, that she had completed the School District's two applications online. That is what made learning about the "incomplete" designation after the deadline had passed so surprising and frustrating. Nor is the School District contending that personnel movement or foul weather at the last minute interfered with its ability to file its Form 471 on time. To the contrary, the School District acted extremely responsibly and reasonably throughout the process, first designating an experienced person to handle its applications and then completing all of them, or so it thought, by January 29, 2007, a full nine days before the deadline. Thereafter, on February 14, when Teague discovered that there was a problem with one of the School District's applications, she contacted USAC immediately and worked with a USAC representative to remedy it -- or so she thought. *See* Letter of Appeal at p. 3.

Please note that the School District relies on Universal Service funds to provide telephone and Internet service to all of its schools. If Form 471 No. 554320 is not remanded to USAC for processing, the failure to receive the funds requested in that application will place an inordinate amount of economic hardship on the District. The State of Oklahoma is experiencing significant revenue shortfalls this fiscal year and, because of that, school districts throughout the state, including the School District, are not receiving all of the funds they were promised. Loss of funding from the Universal Service Fund combined with decreased state funding will adversely affect the District's

technology resources, and the School District will be forced to make very difficult decisions as to which programs it can no longer afford to continue.

The Commission has emphasized repeatedly that accomplishing the goals of the E-rate program requires working with schools and libraries to help them secure the Universal Service support they so urgently need. Penalizing schools and libraries financially for procedural missteps is obviously counterproductive. That is why the Commission has routinely given applicants a second chance when they have made inadvertent procedural or clerical errors while attempting to abide by the program's so many varied and complex rules or missed the Form 471 filing deadline for reasons beyond their control. To do otherwise, the Commission has made clear, would not further the purposes of section 254(h) of the Telecommunications Act of 1996 or serve the public interest.

Therefore, consistent with the Commission's findings and conclusions in both the *Bishop Perry Order* and the *Academy for Excellence Order*, it is evident that good cause exists in this case to grant the School District's request to waive the Form 471 application deadline for Form 471 No. 553420. In these circumstances, deviation from the general rule would much better serve the public interest.

## **CONCLUSION**

For all of the reasons set forth above, the School District requests that the Commission either grant its appeal or waive the Commission's rule (47 C.F.R. §54.507) that denies funding for FCC Form 471 applications filed outside of the FCC Form 471 filing window. Accordingly, the School District requests that the Commission remand this matter to USAC with instructions to process Form 471 No. 553420 and to issue an award or a denial based on a complete review and analysis of the underlying application no later than 90 days from release of the Commission's Order in this matter.<sup>6</sup>

---

<sup>6</sup> See *Academy for Academic Excellence Order* at para. 9.

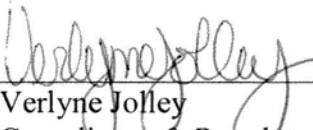
Also, Becki Teague with the Edmond Public Schools has prepared a letter for your review. This letter is attached to the appeal as Exhibit 4.

Respectfully submitted,

**May 30, 2008**

FUNDS FOR LEARNING, LLC  
501 South Coltrane Road (Suite 100)  
Edmond, OK 73034  
405.471.0950  
405.341.7008 (fax)  
vjolley@fundsforlearning.com

By:

  
Verlyne Jolley  
Compliance & Regulatory Analyst

*On behalf of:*  
Edmond Independent School District #12  
1001 W. Danforth Road  
Edmond, OK 73003

Becki Teague  
Coordinator, Instructional Technology  
405-340-2800  
becki.Teague@edmondschools.net



Universal Service Administrative Company  
Schools & Libraries Division

---

**Administrator's Decision on Appeal – Funding Year 2007-2008**

April 03, 2008

Verlyne Jolley  
Funds for Learning  
501 South Coltrane Road  
Suite 100  
Edmond, OK 73004

Re: Applicant Name: EDMOND INDEP SCHOOL DIST 12  
Billed Entity Number: 139732  
Form 471 Application Number: 553420  
Funding Request Number(s): 1540679, 1540899, 1542592  
Your Correspondence Dated: November 29, 2007

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision regarding your appeal for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1540679, 1540899, 1542592  
Decision on Appeal: **Dismissed**  
Explanation:

- Your appeal is made on an "Incomplete" Form 471 for which no decision letter will be issued. Therefore, your appeal is dismissed. Furthermore, the documentation that you provided did not prove that this application was filed inside the Funding Year 2006 filing window. If you missed the filing deadline for Form 471 because of extenuating circumstances, USAC cannot waive the deadline but you can ask the FCC to waive the rules in your case by filing a waiver request with the FCC. Procedures for filing waiver requests are explained on our website at [www.usac.org/sl](http://www.usac.org/sl).

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC.



You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

cc: Becki Teague

Verlyne Jolley  
Funds for Learning  
501 South Coltrane Road  
Suite 100  
Edmond, OK 73004

Billed Entity Number: 139732  
Form 471 Application Number: 553420  
Form 486 Application Number:

**November 29, 2007**

VIA E-MAIL (appeals@sl.universalservice.org)

Letter of Appeal  
Schools and Libraries Division - Correspondence Unit  
100 S. Jefferson Rd  
P.O. Box 902  
Whippany, NJ 07981

## **Letter of Appeal**

### **Funding Year 2007**

**(ISSUE: No FCDL Due to SLD Form 471 Certification Recordation Error)**

**Applicant:** Edmond Independent School District #12  
1001 W. Danforth Rd  
Edmond, OK 73003

**Billed Entity Number:** 139732

**Appeal Contact Information:** Verlyne Jolley  
Compliance & Regulatory Analyst  
Funds For Learning  
vjolley@fundsforlearning.com  
405.471.0950  
405.341.7008 (fax)

501 South Coltrane Road  
Suite 100  
Edmond, OK 73034

**Applicant Contact Information:** Becki Teague  
Coordinator, Instructional Technology  
becki.Teague@edmondschools.net  
405-340-2800

**Form 471 Application #:** **553420**

**FRNs:** 1540679, 1540899, and 1542592

**Date of SLD Decision:** N/A – No official SLD action yet taken

## **ISSUE**

To date the Schools and Libraries Division (SLD) has taken no action on one of the school district's 2007 Funding Year Form 471 applications, apparently because it is labeled incorrectly in the SLD's electronic system as "incomplete."

## **SUMMARY**

On January 29, 2007, well before the close of the "window" application period, Edmond Independent School District #12 (EISD) filed the last of its 2007 Funding Year applications online. That same day, EISD printed out and signed the Block 6 Certification and sent it by certified mail to the SLD. While the SLD has processed and funded EISD's other 2007 funding year applications, it has so far failed to process this one.

EISD filed *both* the Form 471 and the Form 471 Certification on time. Therefore, to minimize the economic hardship to the school district that this unwarranted delay is causing, the SLD should begin processing this application immediately.

## **FACTS**

On January 29, 2007, EISD's Instructional Technology Coordinator, Becki Teague ("Teague"), completed and filed Form 471 #553420 on-line. This application requested \$77,445 in 2007 Funding Year support for a variety of eligible telecommunications services that are critically important to instruction.

Also on January 29<sup>th</sup>, Teague printed out and mailed to the SLD, by certified mail, a fully executed Block 6 certification form for this application. Along with the certification, Teague included the requisite Item 21 Description of Services attachments. The SLD received EISD's Block 6 Certification and Item 21 attachments on February 1, 2007 at 12:09 pm. *See attached USPS Certified Mail Receipt and Delivery Confirmation.*

Ten days later, on February 8, 2007, after a one-day extension due to SLD server problems, the “window application period for the 2007 Funding Year closed. *See Pennsylvania E-rate Listserve Archive*, [http://www.e-ratepa.org/Listserve-Archive/2007/02-07-07\\_2.htm](http://www.e-ratepa.org/Listserve-Archive/2007/02-07-07_2.htm) (“As many of you have experienced, the SLD website has crashed. The SLD is aware of the problem and working on a fix. I will let you know when it has been restored.”).

By submitting Form 471 #553420 online and making sure that the SLD received its Form 471 Certification and Item 21 Attachments well in advance of the original February 7<sup>th</sup> application deadline, EISD did everything within its power to file a timely *and* “complete” application.

Naturally, therefore, when Teague discovered on February 14<sup>th</sup> that one of EISD’s applications, #553420, was appearing on the SLD’s website labeled as “incomplete,” she was shocked. Teague immediately called the SLD’s Client Services Bureau and left a message. While waiting for someone from the SLD to return her call, she printed out from the SLD’s web site another complete copy of the so-called incomplete Form 471.

Shortly thereafter, Sherry Wolford (“Wolford”), an SLD Problem Resolution Representative, returned her call. To remedy the situation, Wolford advised Teague to send the SLD a hard copy of the application and a new certification.

Accordingly, Teague explained the situation to the school district’s Chief Financial Officer and got him to sign the certification – again. Finally, she attempted to fax everything, including the Item 21 Attachments and a cover letter to the SLD’s Client Service Bureau, but the SLD’s fax (1-888-276-8736) was busy. So on February 17, 2007, Teague tried again, this time successfully. EISD heard nothing further from the SLD and assumed the situation had been resolved. Recently, EISD realized the SLD still has the application marked as “incomplete”.

## DISCUSSION

The SLD's records show incorrectly that EISD failed to complete its 2007 Funding Year Form 471 application, #553420. Indeed, the school district completed this entire application twice, once before the filing window closed, and then again, in line with the SLD's very specific instructions, shortly thereafter.

Here, through absolutely no fault of its own, EISD's application somehow managed to slip through a crack in the SLD's application processing system. Note that EISD not only completed its Form 471 online and on time, but significantly, it mailed its Block 6 certification and Item 21 Descriptions of Services to the SLD the very same day. Then, shortly after the Window closed, when the SLD notified EISD that its application was still showing up in its system as incomplete, EISD submitted a copy of it, along with a new certification, exactly as the SLD had instructed.

Filing a Form 471 application requires the successful completion of a two-step process, first filing the application and then the Block 6 certification. Even though the SLD encourages applicants to file their Form 471 applications online, many applicants are forced to complete their certifications off-line because of certain SLD rule restrictions. This of course gives "full" on-line filers (application + certification) an unfair advantage, as it takes human error (on everyone's part) completely out of the equation when it comes to completing the Form 471 application process. Cases like this one in particular point up the harmful and discriminatory impact that creating two classes of filers potentially can have on how E-rate funds are awarded and distributed.

In a long line of cases beginning with the *Bishop Perry Order*<sup>1</sup>, the Commission has ruled that the SLD should be careful not to strip applicants of important E-rate funding because of clerical mistakes or for failing to satisfy the program's many, varied and complex procedural requirements. E-rate applicants, the Commission has made abundantly clear, deserve a second chance - whenever possible. The purpose of the E-rate program is to

---

<sup>1</sup> *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, et al., Schools and Libraries Universal Service Support Mechanism, File No. SLD-487170, CC Docket No. 02-6, Order, (2006) (Bishop Perry Order)*

award discounts to support advanced telecommunications services, not to deny them. As such, in the *Bishop Perry Order*, the FCC asked the SLD to inform applicants if they were missing certification papers. Here the SLD did inform EISD of the missing certification, EISD again provided the certification to the SLD, yet somehow, the SLD did not process or record that the certification pages. With no further communication from the SLD, EISD assumed all paperwork had been received and was in process.

Here, in contrast to the *Bishop Perry* line of cases, the mistake is not the applicant's. Instead, the error appears to be the SLD's. Here, the applicant is not asking for a second chance. It is still waiting for its first.

### **ADMINISTRATIVE ACTIONS REQUESTED**

For all of the reasons set forth above, EISD requests that the SLD take the following administrative actions:

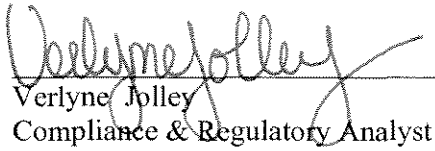
1. Designate Form 471 #553420 as "complete."
2. Designate Form 471 #553420 as timely filed and certified.
3. Modify the SLD's records and website to reflect these corrections.
4. Expedite the processing of Form 471 #553420 and commit the requested funding as quickly as possible.

### **LIST OF DOCUMENTS ATTACHED**

Exhibit 1: Certified Mail Receipt confirming delivery on Feb. 1, 2007

Exhibit 2: Form 471 Application 553420 as signed and faxed to the SLD on February 17, 2007.

Respectfully submitted  
On behalf of Edmond Independent School District #12:



Verlyne Jolley  
Compliance & Regulatory Analyst

Funds For Learning  
vjolley@fundsforlearning.com  
405.471.0950  
405.341.7008 (fax)

501 South Coltrane Road  
Suite 100  
Edmond, OK 7303

cc: Becki Teague  
Coordinator, Instructional Technology  
Edmond ISD #12



[Home](#) | [Help](#)[Track & Confirm](#)

## Track & Confirm

### Search Results

Label/Receipt Number: 7001 1940 0001 7638 4342

Detailed Results:

- Delivered, February 01, 2007, 12:09 pm, LAWRENCE, KS 66046
- Arrival at Unit, February 01, 2007, 9:40 am, LAWRENCE, KS 66046

[< Back](#)[Return to USPS.com Home >](#)

### Track & Confirm

Enter Label/Receipt Number.

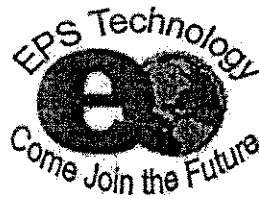
### Notification Options

#### Track & Confirm by email

Get current event information or updates for your item sent to you or others by email. [Go >](#)POSTAL INSPECTORS  
Preserving the Trust[site map](#)[contact us](#)[government services](#)[jobs](#)[National & Premier Accounts](#)Copyright © 1999-2004 USPS. All Rights Reserved. [Terms of Use](#) [Privacy Policy](#)

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Sent To SLD forms Attn: SLD form 471	
Street, Apt. No., or PO Box No. 30	
City, State, ZIP+4 Lawrence KS 66046	

PS Form 3800, January 2001 See Reverse for Instructions



Edmond Public Schools  
Technology Department  
1001 W. Danforth Road  
Edmond, Oklahoma 73003-4801

Phone: 405.340.2812  
Fax: 405.330.7329

To: Sherry Wolford

Organization/Company: Client Services

Phone number: 888.203.8100

Fax Number: 888.276.8736

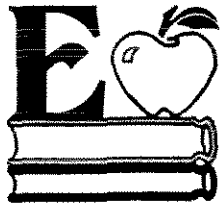
From: Becki Teague

Phone: 405.340.2293

Fax: 405.330.7329

Date: 2-17-07

Number of pages – including cover page: 14



# EDMOND PUBLIC SCHOOLS

*Empowering all students to succeed in a changing society*

February 14, 2007

SLD Form 471  
USAC, Schools and Libraries Division  
3833 Greenway Drive  
Lawrence, Kansas 66044-7026  
Phone: 888.203.8100  
Fax: 888.276.8736

Billed Entity: 139732  
471 Application #: 553420

In a telephone conversation on February 14, 2007 with Sherry Wolford of Client Service Bureau/Problems Resolution it was noted that 471 Application 553420 is listed as incomplete. I have a copy of the completed application and certification and notes that it was filed January 29, 2007. When I print the original 471 application from your web site, I get a complete form. Sherry suggested that we either complete the application online or send a hard copy of the application.

I have tried multiple times to finish the "incomplete" application online. Each time, the web page errors, throwing a "database operation failed" message. See error message attached.

Please honor this copy of our original application, originally filed January 29, 2007 and printed from your web site on February 14, 2007.

If further information is needed, please contact me.

Thank you very much,



Becki Teague

Becki Teague  
Coordinator, Instructional Technology  
1001 W. Danforth Road, Edmond, OK 73003-4801  
v: 405.340.2293 fax: 405.330.7329  
bteague@edmond.k12.ok.us

Billed entity: 139732

## Server Error in '/'Form471' Application.

*Some or all the database operation failed*

**Description:** An unhandled exception occurred during the execution of the current web request. Please review the stack trace for more information about the error and where it originated in the code.

**Exception Details:** System.Exception: Some or all the database operation failed

### Source Error:

An unhandled exception was generated during the execution of the current web request. Information regarding the origin and location of the exception can be identified using the exception stack trace below.

### Stack Trace:

```
[Exception: Some or all the database operation failed]
Microsoft.VisualBasic.ErrorObject.Raise(Int32 Number, Object Source, Object Description, Ob;
Form471.WorksheetA1.SaveRecords() +1376
Form471.WorksheetA1.cmdNoMoreGroup_Click(Object sender, EventArgs e) +12
System.Web.UI.WebControls.Button.OnClick(EventArgs e) +108
System.Web.UI.WebControls.Button.System.Web.UI.IPostBackEventHandler.RaisePostBackEvent(Si
System.Web.UI.Page.RaisePostBackEvent(IPostBackEventHandler sourceControl, String eventArg
System.Web.UI.Page.RaisePostBackEvent(NameValueCollection postData) +33
System.Web.UI.Page.ProcessRequestMain() +1263
```

**Version Information:** Microsoft .NET Framework Version:1.0.3705.0; ASP.NET Version:1.0.3705.0

FCC Form 471

Do not write in this area.

Appro

**Schools and Libraries Universal Service  
Description of Services Ordered and Certification Form 471**

**Estimated Average Burden Hours per Response: 4 hours**

This form asks schools and libraries to list the eligible telecommunications-related services they have ordered and estimate the annual charges for the services. The Fund Administrator can set aside sufficient support to reimburse providers for services.

**Please read instructions before beginning this application. (You can also file online at [www.sl.universalservice.org](http://www.sl.universalservice.org))  
The instructions include information on the deadlines for filing this application.**

**Applicant's Form Identifier**  
(Create your own code to identify THIS form 471) 2007-B

**Form 471 Application#** 553420  
(To be assigned by administrator)

**Block 1: Billed Entity Information** (The "Billed Entity" is the entity paying the bills for the service listed on this form.)

**1 a** Name of Billed Entity EDMOND INDEP SCHOOL DIST 12

**2 a** Funding Year: July 1, 2007 Through June 30, 2008 Billed Entity Number: 139732

**4 a** Street Address, P.O. Box, or Routing Number 1001 W DANFORTH RD

City EDMOND

State OK

Zip Code 73003 4801

**b** Telephone Number 405-340-2800

**c** Fax Number 405-340-2835

**5 a** Type of Application  
☐ Individual School (individual public or non-public school)  
☒ School District (LEA; public or non-public [e.g. diocesan] local district representing multiple schools)  
☐ Library (including library system, library outlet/branch or library consortium as defined under LSTA)  
☐ Consortium ☐ Check here if any members of this consortium are ineligible or non-governmental entities

**6** Contact Person's Name Becki Teague

First, if the Contact Person's Street Address is the same as in Item 4, check this box. If not, please complete the entries for the Street Address.

**b** Street Address, P.O. Box, or Routing Number 1001 W DANFORTH RD

City EDMOND

State OK

Zip Code 73003 4801

☐ **c** Telephone Number 405-340-2800

☐ **d** Fax Number 405-340-2835

☒ **e** E-mail Address becki.teague@edmondschools.net

**f** Holiday/vacation/summer contact information David Fraser



Entity Number	<u>139732</u>	Applicant's Form Identifier	<u>2007-B</u>
Contact Person	<u>Becki Teague</u>	Phone Number	<u>405-340-2800</u>

This information will facilitate the processing of your applications. Please complete all rows that apply to services for which you are requesting discount information on the FIRST Form 471 you file, to encompass this and all other Forms 471 you will file for this funding year. You need not complete this information on subsequent Forms 471. Provide your best estimates for the services ordered across ALL of your Forms 471.

**Schools/school districts complete Item 7. Libraries complete Item 8. Consortia complete Item 7 and/or Item 8.**

### Block 2: Impact of Services Ordered on Schools

IF THIS APPLICATION INCLUDES SCHOOLS...	BEFORE ORDER	AF
7a Number of students to be served		
b Telephone service: Number of classrooms with phone service	1200	

### Block 3: Impact of Services Ordered on Libraries

**NOT APPLICABLE AS THIS APPLICATION IS FOR DISTRICT**

Worksheet A No: 862927      Student Count: 19061  
 Weighted Product (Sum. Column 8): 8630.7

Shared Discount: 4

1. School Name: ADMINISTRATIVE CENTER  
 2. Entity Number: 16025445 NCES: 40 10590 0000  
 3. Rural/Urban: Urban  
 4. Student Count: 0  
 7. Discount: 20%  
 9. Pre-K/Adult Ed/Juv: N

5. NSLP Students: 0  
 8. Weighted Product: 0  
 10. Alt Disc Mech: N

6. NSLP Students/Students:

1. School Name: ANGIE DEBO ELEMENTARY SCHOOL  
 2. Entity Number: 83435 NCES: 40 10590 01864  
 3. Rural/Urban: Urban  
 4. Student Count: 815  
 7. Discount: 40%  
 9. Pre-K/Adult Ed/Juv: N

5. NSLP Students: 121  
 8. Weighted Product: 326  
 10. Alt Disc Mech: N

6. NSLP Students/Students: 14.846%

1. School Name: CENTENNIAL ELEMENTARY SCHOOL  
 2. Entity Number: 16041516 NCES: 40 10590 0000  
 3. Rural/Urban: Urban  
 4. Student Count: 0  
 7. Discount: 40%  
 9. Pre-K/Adult Ed/Juv: N

5. NSLP Students: 0  
 8. Weighted Product: 0  
 10. Alt Disc Mech: N

6. NSLP Students/Students:

1. School Name: CENTRAL MIDDLE SCHOOL

2. Entity Number: 83490      NCES: 40 10590 01326  
 3. Rural/Urban: Urban  
 4. Student Count: 889      5. NSLP Students: 308      6. NSLP Students/Students: 34.645%  
 7. Discount: 60%      8. Weighted Product: 533.4  
 9. Pre-K/Adult Ed/Juv: N      10. Alt Disc Mech: N

1. School Name: CHEYENNE MIDDLE SCHOOL  
 2. Entity Number: 211701      NCES: 40 10590 02303  
 3. Rural/Urban: Urban  
 4. Student Count: 844      5. NSLP Students: 99      6. NSLP Students/Students: 11.729%  
 7. Discount: 40%      8. Weighted Product: 337.6  
 9. Pre-K/Adult Ed/Juv: N      10. Alt Disc Mech: N

1. School Name: CHISHOLM ELEMENTARY SCHOOL  
 2. Entity Number: 83433      NCES: 40 10590 00471  
 3. Rural/Urban: Urban  
 4. Student Count: 646      5. NSLP Students: 59      6. NSLP Students/Students: 9.133%  
 7. Discount: 40%      8. Weighted Product: 258.4  
 9. Pre-K/Adult Ed/Juv: N      10. Alt Disc Mech: N

1. School Name: CIMARRON MIDDLE SCHOOL  
 2. Entity Number: 83432      NCES: 40 10590 475  
 3. Rural/Urban: Urban  
 4. Student Count: 730      5. NSLP Students: 214      6. NSLP Students/Students: 29.315%  
 7. Discount: 50%      8. Weighted Product: 365  
 9. Pre-K/Adult Ed/Juv: N      10. Alt Disc Mech: N

1. School Name: CLEGERN ELEMENTARY SCHOOL  
 2. Entity Number: 83488      NCES: 40 10590 00472  
 3. Rural/Urban: Urban  
 4. Student Count: 252      5. NSLP Students: 26      6. NSLP Students/Students: 10.317%  
 7. Discount: 40%      8. Weighted Product: 100.8  
 9. Pre-K/Adult Ed/Juv: N      10. Alt Disc Mech: N

1. School Name: CLYDE HOWELL CENTER  
 2. Entity Number: 83486      NCES: 40 1059 0473  
 3. Rural/Urban: Urban  
 4. Student Count: 100      5. NSLP Students: 0      6. NSLP Students/Students: 0.000%  
 7. Discount: 20%      8. Weighted Product: 20  
 9. Pre-K/Adult Ed/Juv: N      10. Alt Disc Mech: N

1. School Name: CROSS TIMBERS ELEM SCHOOL  
 2. Entity Number: 83385      NCES: 40 10590 00484  
 3. Rural/Urban: Urban  
 4. Student Count: 863      5. NSLP Students: 130      6. NSLP Students/Students: 15.063%  
 7. Discount: 40%      8. Weighted Product: 345.2  
 9. Pre-K/Adult Ed/Juv: N      10. Alt Disc Mech: N

1. School Name: EDMOND MEMORIAL HIGH SCHOOL  
 2. Entity Number: 83428      NCES: 40 10590 00474  
 3. Rural/Urban: Urban  
 4. Student Count: 1985      5. NSLP Students: 338      6. NSLP Students/Students: 17.027%  
 7. Discount: 40%      8. Weighted Product: 794  
 9. Pre-K/Adult Ed/Juv: N      10. Alt Disc Mech: N

1. School Name: EDMOND PPUBLIC SCHOOLS VO-AG

2. Entity Number: 211704	NCES: 40 10590 0000	
3. Rural/Urban: Urban		
4. Student Count: 0	5. NSLP Students: 0	6. NSLP Students/Students:
7. Discount: 40%	8. Weighted Product: 0	
9. Pre-K/Adult Ed/Juv: N	10. Alt Disc Mech: N	

---

1. School Name: HASKELL ELEMENTARY SCHOOL		
2. Entity Number: 83483	NCES: 40 10590 01965	
3. Rural/Urban: Urban		
4. Student Count: 758	5. NSLP Students: 151	6. NSLP Students/Students: 19.920%
7. Discount: 50%	8. Weighted Product: 379	
9. Pre-K/Adult Ed/Juv: N	10. Alt Disc Mech: N	

---

1. School Name: IDA FREEMAN ES		
2. Entity Number: 198231	NCES: 40 10590 00477	
3. Rural/Urban: Urban		
4. Student Count: 486	5. NSLP Students: 214	6. NSLP Students/Students: 44.032%
7. Discount: 60%	8. Weighted Product: 291.6	
9. Pre-K/Adult Ed/Juv: N	10. Alt Disc Mech: N	

---

1. School Name: IRVING ELEMENTARY SCHOOL		
2. Entity Number: 83387	NCES: 40 10590 00485	
3. Rural/Urban: Urban		
4. Student Count: 778	5. NSLP Students: 87	6. NSLP Students/Students: 11.182%
7. Discount: 40%	8. Weighted Product: 311.2	
9. Pre-K/Adult Ed/Juv: N	10. Alt Disc Mech: N	

---

1. School Name: JOHN ROSS ELEMENTARY SCHOOL		
2. Entity Number: 83386	NCES: 40 10590 01946	
3. Rural/Urban: Urban		
4. Student Count: 1060	5. NSLP Students: 194	6. NSLP Students/Students: 18.301%
7. Discount: 40%	8. Weighted Product: 424	
9. Pre-K/Adult Ed/Juv: N	10. Alt Disc Mech: N	

---

1. School Name: NORTH HIGH SCHOOL		
2. Entity Number: 83388	NCES: 40 10590 01979	
3. Rural/Urban: Urban		
4. Student Count: 2175	5. NSLP Students: 336	6. NSLP Students/Students: 15.448%
7. Discount: 40%	8. Weighted Product: 870	
9. Pre-K/Adult Ed/Juv: N	10. Alt Disc Mech: N	

---

1. School Name: NORTHERN HILLS ELEM SCHOOL		
2. Entity Number: 83489	NCES: 40 10590 00478	
3. Rural/Urban: Urban		
4. Student Count: 754	5. NSLP Students: 118	6. NSLP Students/Students: 15.649%
7. Discount: 40%	8. Weighted Product: 301.6	
9. Pre-K/Adult Ed/Juv: N	10. Alt Disc Mech: N	

---

1. School Name: ORVIS RISNER ELEMENTARY SCHOOL		
2. Entity Number: 83429	NCES: 40 10590 00479	
3. Rural/Urban: Urban		
4. Student Count: 692	5. NSLP Students: 288	6. NSLP Students/Students: 41.618%
7. Discount: 60%	8. Weighted Product: 415.2	
9. Pre-K/Adult Ed/Juv: N	10. Alt Disc Mech: N	

---

1. School Name: RUSSELL DOUGHERTY ELEM SCHOOL		
---	--	--



2. Entity Number: 83484 NCES: 40 10590 00638  
 3. Rural/Urban: Urban  
 4. Student Count: 266 5. NSLP Students: 20 6. NSLP Students/Students: 7.518%  
 7. Discount: 40% 8. Weighted Product: 106.4  
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: SANTA FE HIGH SCHOOL  
 2. Entity Number: 83431 NCES: 40 10590 01360  
 3. Rural/Urban: Urban  
 4. Student Count: 1909 5. NSLP Students: 388 6. NSLP Students/Students: 20.324%  
 7. Discount: 50% 8. Weighted Product: 954.5  
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: SEQUOYAH MIDDLE SCHOOL  
 2. Entity Number: 83491 NCES: 40 10590 00481  
 3. Rural/Urban: Urban  
 4. Student Count: 978 5. NSLP Students: 160 6. NSLP Students/Students: 16.359%  
 7. Discount: 40% 8. Weighted Product: 391.2  
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: SPECIAL SERVICES  
 2. Entity Number: 16025446 NCES: 40 10590 0000  
 3. Rural/Urban: Urban  
 4. Student Count: 0 5. NSLP Students: 0 6. NSLP Students/Students:  
 7. Discount: 43% 8. Weighted Product: 0  
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: SUMMIT MIDDLE SCHOOL  
 2. Entity Number: 83430 NCES: 40 10590 29716  
 3. Rural/Urban: Urban  
 4. Student Count: 780 5. NSLP Students: 170 6. NSLP Students/Students: 21.794%  
 7. Discount: 50% 8. Weighted Product: 390  
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: SUNSET ELEMENTARY SCHOOL  
 2. Entity Number: 83389 NCES: 40 10590 00482  
 3. Rural/Urban: Urban  
 4. Student Count: 651 5. NSLP Students: 288 6. NSLP Students/Students: 44.239%  
 7. Discount: 60% 8. Weighted Product: 390.6  
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: WEST FIELD ELEMENTARY SCHOOL  
 2. Entity Number: 16035422 NCES: 40 10590 0000  
 3. Rural/Urban: Urban  
 4. Student Count: 0 5. NSLP Students: 0 6. NSLP Students/Students:  
 7. Discount: 42% 8. Weighted Product: 0  
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: WILL ROGERS ELEMENTARY SCHOOL  
 2. Entity Number: 83492 NCES: 40 10590 483  
 3. Rural/Urban: Urban  
 4. Student Count: 650 5. NSLP Students: 186 6. NSLP Students/Students: 28.615%  
 7. Discount: 50% 8. Weighted Product: 325  
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

Worksheet A No: 922117

Student Count: 0

Weighted Product (Sum. Column 8): 0

Shared Discount: 1

1. School Name: CENTENNIAL ELEMENTARY SCHOOL

2. Entity Number: 16041516 NCES: 40 10590 0000

3. Rural/Urban: Urban

4. Student Count: 0

5. NSLP Students: 0

6. NSLP Students/Students:

7. Discount: 45%

8. Weighted Product: 0

9. Pre-K/Adult Ed/Juv: N

10. Alt Disc Mech: N

## Block 5: Discount Funding Request(s)

FRN: 1540679 FCDL Date:	
10. Original FRN:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 649940000598415
13. SPIN: 143004662	14. Service Provider Name: Southwestern Bell Telephone, L.P.
15a. Non-Contracted tariffed/Month to Month Service: Y	15b. Contract Number: MTM
15c. Covered under State Master Contract:	15d. FRN from Previous Year:
16a. Billing Account Number: 405.340.2999	16b. Multiple Billing Account Numbers?:
17. Allowable Contract Date: 01/01/2007	18. Contract Award Date:
19a. Service Start Date: 07/01/2007	19b. Service End Date: 06/30/2008
20. Contract Expiration Date:	
21. Attachment #: 2007-B	22. Block 4 Worksheet No.: 862927
23a. Monthly Charges: \$4,727.06	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$4,727.06	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges ( 23c x 23d): \$56,724.72	
23f. Annual non-recurring (one-time) charges: 0 23g. Ineligible non-recurring amt.: 0	
23h. Annual pre-discount amount for eligible non-recurring charges ( 23f - 23g): \$0.00	
23i. Total program year pre-discount amount ( 23e + 23h): \$56,724.72	
23j. % discount (from Block 4): 45	
23k. Funding Commitment Request ( 23i x 23j): \$25,526.12	

FRN: 1540899 FCDL Date:	
10. Original FRN:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 649940000598415
13. SPIN: 143005575	14. Service Provider Name: Cox Oklahoma Telcom, LLC
15a. Non-Contracted tariffed/Month to Month Service: Y	15b. Contract Number: MTM
15c. Covered under State Master Contract:	15d. FRN from Previous Year:
16a. Billing Account Number: 405.340.2999	16b. Multiple Billing Account Numbers?:
17. Allowable Contract Date: 01/01/2007	18. Contract Award Date:
19a. Service Start Date: 07/01/2007	19b. Service End Date: 06/30/2008
20. Contract Expiration Date:	
21. Attachment #: 2007-C	22. Block 4 Worksheet No.: 862927

23a. Monthly Charges: \$8,525.00	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$8,525.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges ( 23c x 23d): \$102,300.00	
23f. Annual non-recurring (one-time) charges: 0	23g. Ineligible non-recurring amt.: 0
23h. Annual pre-discount amount for eligible non-recurring charges ( 23f - 23g): \$0.00	
23i. Total program year pre-discount amount ( 23e + 23h): \$102,300.00	
23j. % discount (from Block 4): 45	
23k. Funding Commitment Request ( 23i x 23j): \$46,035.00	

FRN: 1542592 FCDL Date:	
10. Original FRN:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 649940000598415
13. SPIN: 143025240	14. Service Provider Name: Cingular Wireless
15a. Non-Contracted tariffed/Month to Month Service: Y	15b. Contract Number: MTM
15c. Covered under State Master Contract:	15d. FRN from Previous Year:
16a. Billing Account Number: 405.227.7583	16b. Multiple Billing Account Numbers?: Y
17. Allowable Contract Date: 01/01/2007	18. Contract Award Date:
19a. Service Start Date: 07/01/2007	19b. Service End Date: 06/30/2008
20. Contract Expiration Date:	
21. Attachment #: 2007-D	22. Block 4 Worksheet No.: 862927
23a. Monthly Charges: \$1,089.63	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$1,089.63	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges ( 23c x 23d): \$13,075.56	
23f. Annual non-recurring (one-time) charges: 0	23g. Ineligible non-recurring amt.: 0
23h. Annual pre-discount amount for eligible non-recurring charges ( 23f - 23g): \$0.00	
23i. Total program year pre-discount amount ( 23e + 23h): \$13,075.56	
23j. % discount (from Block 4): 45	
23k. Funding Commitment Request ( 23i x 23j): \$5,884.00	

## Block 6: Certifications and Signature

Do not write in this area.

Application ID:553420

Entity Number	139732	Applicant's Form Identifier	2007-B
Contact Person	Becki Teague	Phone Number	405-340-2800

## Block 6: Certifications and Signature

24. ☒ I certify that the entities listed in Block 4 of this application are eligible for support because they are: (check one or both)

- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the **No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38)**, that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools including, but not limited to elementary, secondary schools, colleges, or universities

25. ☒ I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed in this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

a.	Total funding year pre-discount amount on this Form 471 (Add the entities from Item 23l on all Block 5 Discount Funding Requests.)	\$172,100.28
b.	Total funding commitment request amount on this Form 471 (Add the entities from Items 23K on all Block 5 Discount Funding Requests.)	\$77,445.12
c.	Total applicant non-discount share (Subtract Item 25b from Item 25a.)	\$94,655.16
d.	Total budgeted amount allocated to resources not eligible for E-rate support	\$0.00
e.	Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resources necessary to make effective use of the discounts. (Add Items 25c and 25d.)	\$94,655.16
f.	<input type="checkbox"/> Check this box if you are receiving any of the funds in Item 25e directly from a service provider listed on any Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Items 25e.	

26. ☒ I certify that all of the schools and libraries or library consortia listed in Block 4 of this application are covered by technology plans that are written, that cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, and an SLD-certified technology plan approver, prior to the commencement of service. The plans are written at the following level(s):
- a. ☒ an individual technology plan for using the services requested in this application; and/or
- b. ☐ higher-level technology plan(s) for using the services requested in this application; or
- c. ☐ no technology plan needed; applying for basic local, cellular, PCS, and/or long distance telephone service and/or voice mail only.
27. ☒ I certify that I posted my Form 470 and (if applicable) made my RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology plan goals.



28. ☒ I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.
29. ☒ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. Sec. 54.500(k). Additionally, I certify that the Billed Entity has not received anything of value or a promise of anything of value, other than services and equipment requested under this form, from the service provider(s) or any representative or agent

thereof or any consultant in connection with this request for services.

30. ☒ I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts covering all of the services listed on this Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.
31. ☒ I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.
32. ☒ I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.
33. ☒ I certify that I am authorized to order telecommunications and other supported services for the eligible entity (ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity (ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of this program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under the Title 18 of the United States Code, 18 U.S.C. Sec. 1001 and civil violations of the False Claims Act.
34. ☒ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.
35. ☒ I certify that if any of the Funding Requests on this Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the cost of the contract to eligible and ineligible companies as required by the Commission's rules at 47 C.F.R. Sec. 54.504(g)(1),(2).
36. ☒ I certify that this funding request does not constitute a request for internal connections services, except basic maintenance services, in violation of the Commission requirement that eligible entities are not eligible for such support more than twice every five funding years beginning with Funding Year 2005 as required by the Commission's rules at 47 C.F.R. Sec. 54.506(c).
37. ☒ I certify that the non-discounted portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services features on this Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

38. Signature of authorized person

39. Signature Date

40. Printed name of authorized person

41. Title or position of authorized person

42a. Street Address, P.O. Box or Route Number

City, State Zip Code

42b. Telephone number of authorized person:

() -

42c. Fax number of authorized person:

() -

**42d.** E-mail of authorized person:

**42e** Name of authorized person's employer

**The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.**

**NOTICE:** Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public.

If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

**Please submit this form to:**

**SLD-Form 471  
P.O. Box 7026  
Lawrence, Kansas 66044-7026**

**For express delivery services or U.S. Postal Service, Return Receipt Requested,  
mail this form to:**

**SLD Forms  
ATTN: SLD Form 471  
3833 Greenway Drive  
Lawrence, Kansas 66046**

# AFFIDAVIT

Sate of Oklahoma     )  
                                      )  
County of Oklahoma    )

I, Becki Teague, being duly sworn, hereby affirm under penalty of perjury, that:

1. I am the Coordinator, Instructional Technology for Edmond Public Schools ("District")
2. I was responsible for preparing and filing electronically all of the District's E-rate applications for the 2007 Funding Year.
3. On January 29, 2007, after completing FCC Form 471 No. 553420 on the USAC website, to the best of my knowledge and belief, I submitted that application electronically to USAC by clicking on the proper "button."
4. Also on January 29, 2007, I sent to USAC by certified mail an envelope that included, among other documents, the signed certification form for FCC Form 471 No. 553420, along with the related Item 21 attachments.

  
(Signature)

Becki Teague

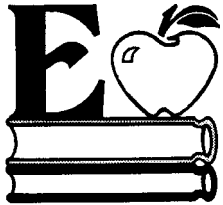
Printed Name

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 30th DAY  
OF May, 2008

  
Notary Public



My Commission Expires 8/4/09



# *EDMOND PUBLIC SCHOOLS*

*Empowering all students to succeed in a changing society*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC, 20554

## **Request for Review** Funding Year 2007

Issue: The Schools and Libraries No FCDL due to SLD Form 471 Certification Recordation Error  
SLD Appeal Dismissed April 3, 2008.

CC Docket No. 96-45  
CC Docket No. 02-6

Applicant: Edmond Indep School Dist 12  
Billed Entity Number: 139732  
Form 471 Application Number: 553420  
Funding Request Number(s): 1540679, 1540899, 1542592

Applicant Contact Information: Becki Teague  
Edmond Public Schools  
[Becki.teague@edmondschools.net](mailto:Becki.teague@edmondschools.net)  
405.340.2293  
405.340.2835 (fax)

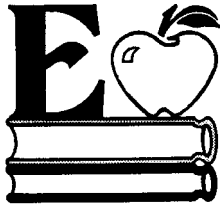
1001 W. Danforth Road  
Edmond, Oklahoma 73003

### **Issue:**

We are asking for a **Review** of the School and Library Division of the Universal Service Administration Company's decision to **Dismiss** our appeal of their decision on Form 471 Application # 553420 regarding FRNs 1540679, 1540899, and 1542592.

*Becki Teague*  
Coordinator, Instructional Technology  
1001 West Danforth, Edmond, Oklahoma 73003-4801  
Telephone 405-340-2293 FAX 405 330-7329  
[Becki.Teague@edmondschools.net](mailto:Becki.Teague@edmondschools.net)





# EDMOND PUBLIC SCHOOLS

*Empowering all students to succeed in a changing society*

## Summary

On January 29, 2007, before the close of the application period, Edmond Independent School District #12 filed 471 Application #553420 online. That same day, the certification form was printed, signed and sent by certified mail. The SLD processed and funded our other 2007 applications yet has failed to fund this one.

Both the Form 471 and the Form 471 Certification were filed on time. The District has filed and been funded for the past ten years without issue, now one clerical error is resulting in funding denial.

**Historic details of this process are included in information in this packet and will not be duplicated here.**

The funds received from the SLD are used to provide telephone and Internet service to the schools. Failure to receive these funds will put an inordinate economic hardship on the District. The State of Oklahoma is experiencing significant revenue shortfalls this fiscal year; resulting in a failure to provide promised funds to school districts, including the Edmond Independent School District # 12. Loss of funding from the Universal Service Fund combined with decreasing state funding will create financial hardships on the District's technology resources. The District will be required to make very strategic decisions regarding which programs to continue.

It is the understanding of the District that purpose of the E-rate program is to award discounts to support advanced telecommunications services, not to deny them. It is also understood that in many cases the Commission has ruled that the SLD should not strip applicants of important E-rate funding because of clerical mistakes or for failing to satisfy the program's many, varied, and complex procedures. There is no question that this funding is important to the District. We are asking the Commission for a second chance.

## Action requested

1. Designate Form 471 #553420 as complete
2. Designate Form 471 #553420 as filed and certified on time
3. Expedite the processing of Form 471 #553420 and commit the requested funding as soon as possible.

Thank you for considering this request.

*Becki Teague*

Coordinator, Instructional Technology

1001 West Danforth, Edmond, Oklahoma 73003-4801

Telephone 405-340-2293 FAX 405 330-7329

Becki.Teague@edmondschools.net